

District Judge Tana Lin

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

RAVI KIRAN CHILAKAPATI,

Plaintiff,

v.

DIRECTOR OF UNITED STATES
CITIZENSHIP AND IMMIGRATION
SERVICES,

Defendant.

No. 2:23-cv-01604-TL

STIPULATION OF DISMISSAL

Noted for Consideration:
February 7, 2024

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the parties hereby stipulate to dismiss this case on the following terms:

1. Defendant agrees to issue a Service Motion to Reopen ("SMTR") within 14 days of this Stipulation. The SMTR will allow Plaintiff to provide evidence that the gift of \$20,000 towards the purchase of Plaintiff's house derived the funds from a lawful source.

2. Defendant agrees to issue to Plaintiff an approval, denial, request for evidence, or notice of intent to deny within 21 days of actual receipt of Plaintiff's response to the SMTR.

3. Plaintiff agrees to provide Defendant tracking information for its response to the SMTR through counsel within 5 business days of mailing; and

4. If Defendant issues a request for evidence or notice of intent to deny, it further agrees to make a final decision within 90 days on the same terms as prescribed in Paragraph 2.

5. The parties agree to dismiss this case without prejudice, bearing their own costs and fees.

6. If Plaintiff believes Defendant has breached this agreement in any way, he will notify undersigned counsel and provide Defendant with at least 14 days to remedy any such breach. If Defendant fails to remedy said breach within 14 days, Plaintiff may file a Motion to Reopen this matter. Defendant agrees to be subject to jurisdiction and venue regarding any such filing sought to enforce the terms and conditions of this Stipulated Dismissal, filed in this Court / within the Western District of Washington.

DATED this 7th day of February, 2024.

Respectfully submitted,

TESSA M. GORMAN
United States Attorney

KARR, TUTTLE, CAMPBELL

/s/Michelle R. Lambert
MICHELLE R. LAMBERT, NYS #4666657
Assistant United States Attorney
United States Attorney's Office
Western District of Washington
1201 Pacific Avenue, Suite 700
Tacoma, Washington 98402
Phone: (253) 428-3824
Email: michelle.lambert@usdoj.gov

/s/Kripa Upadhyay
KRIPA UPADHYAY, WSBA #40063
701 Fifth Ave, Suite 3300
Seattle, WA 98104
Phone: 206.224.8092
Email: kripa@karrtuttle.com


Attorney for Plaintiff

Attorneys for Defendant

~~{PROPOSED}~~ ORDER

The parties having so stipulated, the above is SO ORDERED. The case is dismissed without prejudice.

DATED this 7th day of February 2024.



Tana Lin
United States District Judge